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9 Attorneys for WOLFF PRINCIPAL HOLDINGS, LP  
10 dba FREMONT & 9<sup>TH</sup> APARTMENTS

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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2 SETH SCHORR,

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CASE NO.: 2:22-CV-01806-MMD-MDC

1 Plaintiff,

2 v.

3 WOLFF PRINCIPAL HOLDINGS, LP dba  
4 FREMONT & 9<sup>TH</sup> APARTMENTS;  
5 SCHEINDLER ELEVATOR  
6 CORPORATION; DOES I through X; and  
7 ROE BUSINESS ENTITIES I through X,  
8 inclusive,

9 Defendants.

10 and related cross-claims

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JOINT STIPULATION AND ORDER TO  
EXTEND DEADLINES FOR  
DEFENDANTS' INITIAL EXPERT  
DISCLOSURES AND REBUTTAL EXPERT  
DISCLOSURES

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IT IS STIPULATED AND AGREED, by and between Plaintiff Seth Schorr, by and through  
his attorney of record, Nia Killebrew, Esq. of Richard Harris Law Harris Law Firm; Defendant  
Wolff Principal Holdings, LP d/b/a Fremont & 9<sup>TH</sup> Apartments, by and through its attorney of  
record, David S. Lee, Esq. of Lee, Landrum & Ingle, and Defendant Schindler Elevator  
Corporation, by and through its attorney of record, Jay J. Schuttert of Evans Fears Schuttert  
McNulty Mickus that the deadlines for Defendants' Initial Expert Disclosure and Rebuttal Expert  
Disclosures be extended one week from their current due dates.

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The parties have been working diligently to complete discovery in this case. The parties  
are currently in the process of disclosing expert witnesses. Plaintiff served his initial expert  
disclosure on July 29, 2024. The Defendants' initial expert disclosures were due to be served on  
August 26, 2024. Rebuttal Expert disclosures are due on September 24, 2024.

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1           Defendant Wolff Principal Holdings LP d/b/a Fremont & 9<sup>th</sup> Apartments (“Wolff”) is  
 2 seeking a one-week extension to serve its initial expert disclosure, seeking a new disclosure date of  
 3 September 3, 2024. Defendant Schindler Elevator Corporation (“Schindler”) agrees to Defendant  
 4 Wolff’s request for a one-week extension, if the same extension is provided to Schindler. Plaintiff  
 5 has agreed to the one-week extension of time for both Defendants to serve their initial expert  
 6 disclosures, in exchange for a one-week extension of time to serve Rebuttal Expert Disclosures.  
 7 The new, agreed upon due date for Rebuttal Expert Disclosures will be October 1, 2024.  
 8 Defendants Wolff and Schindler agree to the extension of time for Rebuttal Expert Disclosures and  
 9 the new disclosure date.

10           **I. PROPOSED REVISED DISCLOSURE DATES**

11           The parties hereby stipulate to extend the following two (2) disclosure deadlines and  
 12 propose the following amendments to the current discovery deadlines:

	<b>Old Deadline</b>	<b>New Deadline</b>
14           Defendant’s initial expert disclosures:	August 26, 2024	September 3, 2024
15           Rebuttal expert disclosures:	September 24, 2024	October 1, 2024
16           No trial date has been set.		

17           **SUBMITTED BY THE FOLLOWING COUNSEL OF RECORD:**

19           Dated: August 26, 2024.

21           **EVANS FEARS SCHUTTERT  
MCNULTY MICKUS**

23           Jay J. Schuttert  
 24           Jay J. Schuttert, Esq. (SBN 8656)  
 25           Skylar Arakawa-Pamphilon, Esq.  
 26           (SBN 15864)  
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 28           Las Vegas, NV 89119  
 29           Attorneys for Defendant/Cross-Defendant  
 30           Schindler Elevator Corporation

21           **RICHARD HARRIS LAW FIRM**

23           Nia C. Killbrew  
 24           Nia C. Killebrew, Esq. (SBN 4553)  
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 27           Attorneys for Plaintiff Seth Schorr

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6 *Attorneys for Defendant Wolff Principal Holdings, LP dba Fremont & 9<sup>th</sup> Apartments*

7 **ORDER**

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9 **IT IS SO ORDERED.** Based upon the foregoing stipulation, the request to extend the  
10 following two (2) disclosure deadlines is granted as follows:

	<b>Old Deadline</b>	<b>New Deadline</b>
13 Defendant's initial expert disclosures:	August 26, 2024	September 3, 2024
14 Rebuttal expert disclosures:	September 24, 2024	October 1, 2024

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18 Hon. Maximiliano D. Couvillier III  
19 UNITED STATES MAGISTRATE JUDGE  
20 DATED: 8/27/24  
21 Case No. 2:22-cv-01806-MMD-MDC

22 Respectfully submitted by:

23 **LEE, LANDRUM & INGLE**

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28 *Attorneys for Defendant Wolff Principal Holdings, LP dba Fremont & 9<sup>th</sup> Apartments*